

Dear Sirs

In response to the document on Remedy Options, please review my thoughts as follows.

I must say as a simple funeral director with over 40 years dedicated service to the bereaved, in the midst of what is looking like a huge burden for the whole country (Covid 19), suddenly our problems seem rather small. However we need to reform and I hope we can achieve this without too much difficulty for funeral directors to comply, administrators to observe and correct, and most importantly the client families to understand and navigate.

My personal preference, and that of a large number of my peers, is a fairly simple solution I think and one that you are already giving close consideration to.

To be quite simplistic. We need the client families to be able to observe the level of charges made by each funeral director company. Your price comparison website will do this most efficiently. All funeral directors are ready to embrace this option as the simple answer to all the problems.

Firstly. It will mean funeral directors will have to publish their prices. A big step forward on its own. There must be a benchmark funeral. (I would like to discuss my thoughts on this later) We would all be able to observe our competitors' prices and provided we are happy with the differential between us, then it would only remain for the client families to select their preferred provider. The prices shown will no doubt cover the "normal" spread of charges made by these companies. Clients can make their selection based entirely on price if this is their main concern. Online prices would need to be enforceable on the funeral director, without the "show me your quote and I'll do it for less" option that exist at the present. This would prevent what I think is unethical practice. Those companies who wish to operate at a lower price, but piggyback on the higher charges of other companies, would finally have to make a stand on their own price structure.

Secondly. Through the ease of currently available technology, website administrators will immediately be alerted to any funeral director compliance deficiency. That should remove a huge burden very efficiently, from any compliance official. And make reviewing compliance much easier and hopefully therefore cheaper!

Thirdly. This is a very important issue for many funeral directors who are extremely concerned about price capping. Me too! The website will allow for funeral directors in the north of Scotland to charge a different amount to funeral directors in the south or central London. And importantly the variance that takes place will be gradual across

the country. However it will give bereaved families the chance not currently available, for them to consider funeral directors out of their area should this be suitable or convenient geographically. I think this is a very important option.

The complicated, possibly very complicate and probably expensive monitoring system currently under consideration is therefore unnecessary. Considering your own research has shown that there is little evidence of client dissatisfaction with price or service, surely this (price comparison website) would be a better option. This would then allow funeral directors to show their compliance with the benchmark funeral service you require. It would also allow them some flexibility for example, to invest more if they wish in company uniform than you think is correct. I provide my staff with everything they need to wear excepting only their underwear! This isn't cheap to do, however I wish to continue to provide the highest standard I can, why should I not do this and who is to say if this is "over investment". Similarly if a funeral director does not wish to do this, then that is perfectly in order for them to operate that way. The reputation of each funeral director, the standard they provide, and the price they each charge will be available to each bereaved family to select from. Or I may wish to use more modern vehicles and invest in them if I wish, as I have last year. Two new vehicles cost the company £250.000, but they are now adding to the high stand of service and facility that I want to offer to my clients. Why should I not do this if I wish to. And I do survey anonymously, all my clients if they accept this at the GDPR point in the arrangement interview. Non have ever, even anonymously, made any comment about the price we charge for our services. Come and have a look!

Back room standards. A hot potato here. If you are able to "level up" the standards required it would be a huge step forwards. For too long families have been tricked and hoodwinked into using the services of a lower price company, who keep bodies in their garage or even inside vehicles and take them from work to home and back, until the service takes place!!! Totally disgusting and abhorrent to any professional funeral director. A very concerning aspect of the higher prices of funerals over the last decade, is the arrival of people who move into the industry just to make a profit. There are many examples to be seen and they usually start by offering a very discounted price to entice unsuspecting bereaved families into their establishment. But behind the scenes all sorts of chaos and bad practice exists. One of my own companies has had first hand experience of a bereaved family breaking into another so called funeral directors premises, literally stealing the body of their relative, and bringing her body to our premises so that a funeral could take place. Its unbelievable isn't it. We were in contact with the local police throughout the whole debacle to protect ourselves. The so called funeral director had previously been advertising the "horrendous charges" of established funeral directors. Thoroughly bad mouthing us on a local radio programme. And generally making derogatory statements about all

of us. We very quietly cleared up their mess when they decided it wasn't for them. The family concerned are a committed client of ours now!

Mortuary facilities. Please, please, please, be prescriptive about what is required. We really need this. I can imagine that there are many who would require time to change and introduce a good standard of facility. I see organising this change in standard as a headache. My other request is please do away with tiles and grout. Too many bugs can live in this terrible stuff. There are perfectly excellent plastic coated alternatives. Extraction must be at low level (the knee or below to protect embalmers even when we do move to new embalming fluids) Waterproof electrical fitting. Hand sanitizer and protective clothing dispensers at the entrance. Clinical waste contracts (you might be amazed how many still take theirs to the tip in black bags!) Hard flooring without corners, and refrigeration! The UK has high temperatures in the summer and a deceased body will decompose quickly enough given poor care.

Website reviews. I personally use these myself when booking hotel or restaurant visits. I check reviews and observe their star rating to inform my selection. If I only want to stop en-route to my final destination, then simple accommodation is fine. Whereas I may select a more upmarket hotel once at my destination. I would be very pleased to see the introduction of a star rating system and I can assure you I'd be very keen to do anything to have the higher rating, as would all professional funeral directors. This would be a very easy way of incentivising the funeral profession.

The Benchmark funeral. I have some concerns about what will and will not be included in this package. I should say that nobody was ever born in a package and they will not like being encouraged to go out in one either. People can be fickle when it comes to deciding what they want. Therefore your guidance could be very helpful indeed. I have no issue with most of what is described in table 1.

The Benchmark will be a competitive price for most funeral directors. Allow them to stipulate on the price comparison website if they impose a time restriction on this service.

Storage of the deceased of course. But only in suitable facilities. The mortuary must be to a certified standard. And they are not to be allowed to leave the deceased waiting at the hospital mortuary until the day of the service. That's not the job of the hospital.

Care of the deceased including professional only embalming. Yes new embalmers need to learn, but under controlled circumstances and with qualified tutors.

Client advice and support, of course. Etc etc.

Date and time flexibility for the service, should be an option the funeral directing company indicates on the comparison website. Most companies would offer a lower price at different times of day.

Viewing the deceased. Of course this should be included, however most people would consider usual office working hours to be 9am till 5pm. Certainly my staff are employed to work these hours in their contract of employment.

One limousine. This is something I would describe as an extra to a funeral. Most people have a car of their own or cars even. We frequently meet family members at the service venue as many times the deceased passed away in an institution of one sort or another, and turning up with a hearse and coffin isn't considered the thing to do. But again it would be easy to show an additional charge on the price comparison website.

Embalming. This is something you will appreciate, that I am concerned should be included. In my staff Health & Safety Manual, (as provided by the HR company I employ for this and other services) it states that I must maintain and protect the health and safety of the environment in which the staff I employ, and visitors and contractors are required to work. A decomposing body, even when refrigerated, is not a pleasant situation. Most funeral staff in the offices of funeral directors up and down the country, work in a fairly small space not usually very far removed from the deceased themselves. Yes there should be embalming and ventilation. However when the weather is warm, and it doesn't have to be very hot either, the body will start to decompose and smell. There is a very particular smell to a deceased person. Entirely unpleasant, and if the staff are required to stay on the premises all day it can be quite distressing and nauseating. Then of course the staff will want to have a meal break which they may select to take on the premises. Imagine the situation when you're trying to eat your lunch with the smell permeating everywhere. Then the next family come onto the premises and immediately they get the smell of a decomposing deceased. Or the embalmer comes onto the premises and has to work alongside this body. This is all terribly unnecessary, not to say unprofessional. However if you remove embalming from the Benchmark service, exactly this situation will be happening across the land. Please raise the standard for excellent "Standards" and let us remove the awful situation from the realms of possibility. Some people do say they don't want their relative to be embalmed. This already happens at the moment. But they usually do want decency for their Mum or Dad, and once it is explained calmly most families are happy to accept it. My own companies don't charge separately for it, preferring it to be part of our professional duty to the deceased and the family. Please make it so.

Please don't exclude any funeral directors from the regulation that is finally settled on. It would be easy for unscrupulous funeral director to artificially remain below any "smallest funeral director" level. And some of these small companies have been the most appalling as in the example earlier.

Cost reflectivity is a strange thing. I did ask my accountant what it meant first (he had never heard of it). When I go to the petrol station, if the price of a barrel of oil goes up, then the cost of the petrol goes up and vice versa, eventually. Is this what you mean? Or will all businesses have to sell items at cost from now on. Sweet shops selling at cost. Restaurants selling meals at cost of materials. I can't see that working.

I could do more with the huge document that was sent out, and I see that you are giving yourselves extra time to deliver your final response. So I will post this to you now as I have, along with my colleagues up and down the country, to deal with a national emergency in my own small way.

Family Funeral Service (Maidstone) Ltd